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BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

Federal Communications Commission
Office of Secretary

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In Re)
)
Amendment of Section 73.202(b)) MM Docket _____
Table of Allotments,) RM- _____
FM Broadcast Stations)
Troup, Texas)

To: Chief, Policy and Rules Division

PETITION FOR RULEMAKING

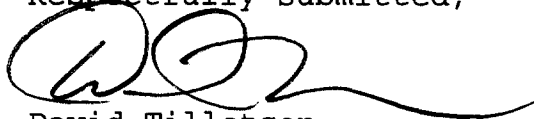
Dudley Waller ("Waller"), by his attorney, hereby petitions for amendment of Section 73.202(b) of the Commission's Rules, Table of FM Allotments, to add Channel 247C2 at Troup, Texas, as that community's first FM allotment.

Attached hereto is an Engineering Study which reflects Channel 247C2 can be used to serve Troup, Texas, in conformance with the principal city coverage requirement of Section 73.315 of the Commission's rules and all applicable separation requirements from a reference site located approximately 21.6 kilometers northeast of the community. The Engineering Study also contains information establishing that Troup, Texas, has the attributes of a distinct community warranting that the community be allotted an FM channel.

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MAB

If this Petition is granted, Waller intends to file an application for a construction permit for Channel 247C2 at Troup, Texas, and, if his application is granted, promptly to construct a station the channel.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'David Tillotson', with a long horizontal flourish extending to the right.

David Tillotson
4606 Charleston Terrace, N.W.
Washington, DC 20007
Tel: 202/625-6241

Attorney for Dudley Waller

Date: April 29, 1998



WHEELER BROADCAST CONSULTING

Engineering Study

Proposed Rule Making Channel 247 C2 - Troup, Texas

This consultant has been retained by Dudley Waller for the purpose of preparing an engineering statement in support of a Proposed Rule Making to amend the FM table of allotments, 47 CFR 73.202 (b), by adding Channel 247 C2 to Troup, TX as its first local service.

At the request of Dudley Waller, this consultant performed a full commercial channel search of the Commission's April 20, 1998 FM database in order to determine the availability of a FM channel for allocation to Troup, Texas. The study revealed that Channel 247 C2 could be allocated to Troup, with the imposition of a 21.6 km North East site restriction.

The coordinates of Troup, Texas are listed by the United States Census Bureau as follows:

32° 08' 41" N. Latitude
95° 07' 23" W. Longitude

6025 MARTWAY
SUITE 112
MISSION, KS 66202
913.362.7282
913.362.7287

Reference coordinates for the proposed Channel 247 C2 service were determined by selecting the point nearest to Troup while meeting the minimum separation requirements set forth in 47 CFR 73.207. The reference coordinates calculated for the proposed Channel 247 C2 allocation are:

32° 17' 56" N. Latitude
94° 58' 54" W. Longitude

The distance and bearing from Troup to the Channel 247 C2 reference coordinates is 21.6 km at 37.9° True. Exhibit 1 of this report is a search of the Commission's April 20, 1998 FM database which demonstrates that the site meets all minimum separation requirements from the proposed reference site. Exhibit 2 is a digitally generated map, generated from USGS and NGDC data, which indicates the reference site and the predicted 60 dBu and 70 dBu contours from the reference coordinates indicating compliance with the principal community coverage requirements of 47 CFR 73.315

Troup, Texas

Troup, Texas is an incorporated city with a Mayor, City Administrator, and City Council form of government. The population of Troup is 1659 persons according to the 1990 US Census. Troup has a post office with its own zip code, 75789. Troup supplies water to its citizens with a city owned water system. Troup is home to one local newspaper, 14 Churches, and a 60 bed nursing home. Troup further maintains a municipal library and a community center. Educational needs of the citizens of Troup are provided by a elementary schools, a middle school, and a high school.

Public safety services are provided to the residents of Troup by the Troup Police Department which employs 4 paid police officers. Additional police services are provided by a county constable and deputies that are attached to a County Courthouse Annex that is located in Troup. Fire protection is provided by a volunteer fire department. Troup maintains a modern emergency ambulance service and an emergency helicopter landing pad. Other medical needs are provided two local clinics with two doctors as well as two dental clinics.

There are numerous recreational facilities and cultural activities in Troup including a country club, a municipal swimming pool, a baseball field and tennis courts. Economic development is fostered by the Troup Chamber of Commerce as well civic organizations including the Rotary and Kiwanis Clubs, a Professional Women's Club, and an Industrial Foundation that aids in the establishment of new industries. Troup is home to a variety of industries including machining, a plastic manufacturing company, clay processing firms, several plant farms that provide bedding plants, and other small manufacturing firms.

Conclusion

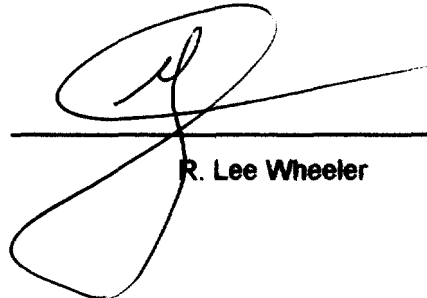
Troup, Texas is a community deserving of its first commercial FM service and this proposal provides that service. The proposed Channel 247 C2 facilities proposed herein would not only provide the 1659 residents of Troup with a first local service but would further provide a total population of 369,239 persons with an additional aural service. No other licensed or proposed radio station would be impacted by the proposed allocation. In light of the above facts, this proposal is clearly in the public interest and it is respectfully requested that 47 CFR 73.202(b) be amended as follows:

Community	Present	Proposed
Troup, TX	-----	247 C2

Certification

All information contained in this report is true and accurate to the best of my belief. Having had numerous matters before the Commission, my qualifications are a matter of record.

4/23/98
Date


R. Lee Wheeler

WHEELER BROADCAST CONSULTING
6025 Martway - Suite 112 - Mission KS 66202

Channel 247 C2
Troup, Texas

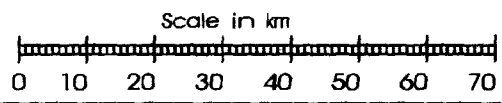
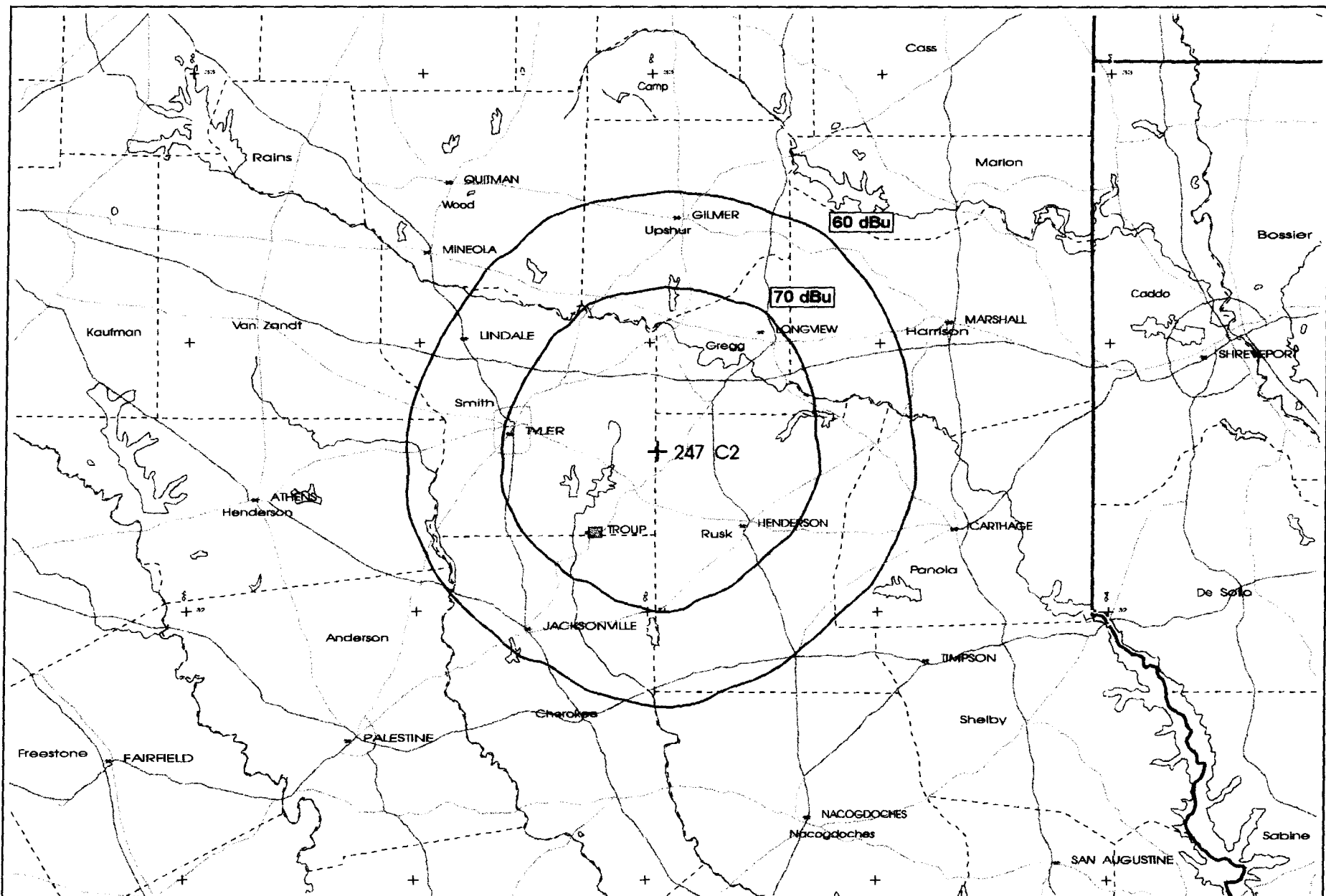
REFERENCE		DISPLAY DATES
32 17 56 N	CLASS C2	DATA 04-20-98
94 58 54 W	Current rules spacings	SEARCH 04-23-98
----- CHANNEL 247 - 97.3 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
KEGL	246C	Fort Worth	TX	280.1	188.00	188.0	0.00 *
LI CY	32 34 43	96 57 12	100.000 kW	445M	116.8	116.8	
	Eagle Radio, Inc.				BLH9999		
KWRW	249C3	Rusk	TX	198.7	56.06	56.0	0.06 <
LI ZCN	31 49 12	95 10 19	14.500 kW	124M	34.8	34.8	
	E. H. Whitehead				BLH940124KB		
KKTL.C	246C	Cleveland	TX	181.0	195.60	188.0	7.60
CP CN	30 32 06	95 01 05	100.000 kW	300M	121.6	116.8	
	Texas Classical Radio, Inc.				BPH961121IB		980930
>From Channel 246C1 per D91-172							
KKTL.C	246C	Cleveland	TX	181.0	195.60	188.0	7.60
CP CN	30 32 06	95 01 04	100.000 kW	563M	121.6	116.8	
	Texas Classical Radio, Inc.				BPH950920IG		971017
>From channel 246C1 Per D91-172							
KKTL.A	246C	Cleveland	TX	184.0	201.67	188.0	13.67
AP CN	30 29 04	95 07 50	100.000 kW	388M	125.3	116.8	
	Texas Classical Radio, Inc.				BMPH970917IZ		
KDBH.C	247C3	Natchitoches	LA	107.7	190.73	177.0	13.73
CP CN	31 45 47	93 03 47	25.000 kW	95M	118.5	110.0	
	Cane River Communications, In				BPH970714IE		990714
>From Channel 249A per D91-109							
KMOOFM	244A	Mineola	TX	313.2	73.60	55.0	18.60
LI CN	32 45 04	95 33 18	3.000 kW	91M	45.7	34.2	
	KMOO Incorporated				BLH7526		
>*To Channel 260A per D96-10							
>Petition for Recon D96-10 filed 2-28-97-Dismissed MO&O D96-10, 9708							
ALOPEN	245A	Pittsburg	TX	3.1	78.51	55.0	23.51
AL N	33 00 21	94 56 10	0.000 kW	0M	48.8	34.2	
	84-231		WO= 960402				960507
KLIS.C	244C2	Palestine	TX	227.2	84.70	58.0	26.70
CP CN	31 46 48	95 38 23	50.000 kW	117M	52.6	36.0	
	Nicol/Excel Broadcasting LLC				BPH970131IC		981130

WHEELER BROADCAST CONSULTING
6025 Martway - Suite 112 - Mission KS 66202

CLASS C2

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
>From Channel 244A per one-step application							
KLIS	244A	Palestine	TX	227.2	84.70	55.0	29.70
LI CN	31 46 48	95 38 23	3.000 kW	91M	52.6	34.2	
Nicol/Excel Broadcasting LLC					BLH820510AE		
>*To Channel 244C2 per one-step application BPH-970131IC							
AP245	245A	Pittsburg	TX	8.4	85.45	55.0	30.45
AP CN	33 03 40	94 50 52	6.000 kW	100M	53.1	34.2	
John Mitchell					BPH960507MV 980416		
AP245	245A	Pittsburg	TX	5.8	88.28	55.0	33.28
AP ZCN	33 05 27	94 53 11	5.200 kW	100M	54.9	34.2	
OARA, Inc.					BPH960502MF		
KKTL	246C1	Cleveland	TX	181.0	195.60	158.0	37.60
LI CN	30 32 06	95 01 05	100.000 kW	299M	121.6	98.2	
Texas Classical Radio, Inc.					BLH921223KC		
>*To channel 246C Per D91-172							
KKTL.A	246C	Cleveland	TX	183.4	229.62	188.0	41.62
AP CN	30 13 53	95 07 26	0.800 kW	458M	142.7	116.8	
Texas Classical Radio, Inc.					BPH980213IA		
>Auxiliary Facility							
KALK	249C3	Winfield	TX	347.9	100.40	56.0	44.40
LI ZCN	33 11 01	95 12 32	22.500 kW	100M	62.4	34.8	
Parker-Hill Communications, I					BLH920813KC		



Proposed 247 C2 Troup, TX

N. Lat. 32 17 56

W. Lng. 94 58 54

EXHIBIT 2

L. WHEELER - 04/98